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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PAULA CHMIEL, individually;  
Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, a Foreign  
Company; DOES I through X, inclusive; ROE  
CORPORATIONS XI through XX, inclusive,  
Defendants.

CASE NO.: 2:22-cv-1768-RFB-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
[SECOND REQUEST]**

Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case by ninety (90) days, up to and including Tuesday, January 16, 2024. In addition, the parties request that all other future deadlines contemplated by the Discovery Plan and Scheduling Order be extended pursuant to Local Rule. In support of this Stipulation and Request, the parties state as follows:

**DISCOVERY COMPLETED**

1. On November 16, 2022, the parties conducted an initial FRCP 26(f) conference.
2. On December 21, 2022, Plaintiff served written discovery on Defendant State Farm. State Farm's Responses are due on March 7, 2023.



propounding written discovery requests and preparing responses thereto; records procurement; and preparing for Plaintiff's deposition.

Counsels for Plaintiff and Defendants have been discussing attending mediation in an attempt to settle this matter. If settlement in mediation is unsuccessful the parties have discussed submitting this matter to binding arbitration. Therefore, counsels are requesting this extension in an attempt to resolve this matter without additional Court involvement.

Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-3. This stipulation is made more than 21 days before the expiration of any deadlines.

This is the second request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension.

The following is a list of the current discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>Wednesday, October 18, 2023</i>	<i>Tuesday, January 16, 2024</i>
Deadline to Amend Pleadings or Add Parties	<i>Thursday, July 20, 2023</i>	<i>Wednesday, October 18, 2023</i>
Expert Disclosure pursuant to FRCP 26 (a)(2)	<i>Monday, August 21, 2023</i>	<i>Monday, November 20, 2023</i>
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	<i>Monday, September 18, 2023</i>	<i>Monday, December 18, 2023</i>
Dispositive Motions	<i>Thursday, November 16, 2023</i>	<i>Wednesday, February 14, 2024</i>

Scheduled Event	Current Deadline	Proposed Deadline
Joint Pretrial Order	Thursday, December 14, 2023	Wednesday, March 13, 2024  <i>If dispositive motions are pending, then the parties will serve their Joint Pretrial Order within thirty days of the Court's order as to the parties' dispositive motions.</i>

WHEREFORE, the parties respectfully request that this Court extend the discovery period by ninety (90) days from the current deadline of October 18, 2023, up to and including January 16, 2024, and the other dates as outlined in accordance with the table above.

Dated this 17th day of July, 2023.

Dated this 17th day of July, 2023.

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HICKS & BRASIER, PLLC.

/s/ Frank A. Toddre, II

/s/ Alison M. Brasier

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### **ORDER**

IT IS SO ORDERED.

DATED this 18th day of July, 2023.

  
UNITED STATES MAGISTRATE JUDGE